



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

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January 12, 2022

By ECF

Hon. Ronnie Abrams  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Jane Stone #s 1-5 v. Annucci, et al.,  
20-CV-1326 (RA) [rel. 16-CV-01473 (RA)]

Dear Judge Abrams:

I write respectfully to request a thirty-day adjournment of defendant Pedro Norde's time to respond to the Second Amended Complaint ("SAC") from January 14, 2022, to February 14, 2022, in order to allow Officer Norde time to retain counsel in this matter. Since the Court issued its last Order, on December 17, 2022, directing defendant Norde to respond to the SAC by January 14, 2022, the Office of the Attorney General ("OAG") has concluded its Public Officers Law § 17 representation analysis and has determined that while it cannot represent Officer Norde in this matter, he is entitled to a state funded defense. I have spoken with Officer Norde and have alerted him to the OAG's determination, that he needs to retain counsel, and that, in order to protect his interests herein and to avoid a default, I would file this application on his behalf.

This is defendant Norde's third application to adjourn his time to respond to the SAC. I have contacted counsel for Plaintiff to alert them to the situation and to request their consent to this application. They have advised me that they consent to this application.

Application granted.

Respectfully submitted,

SO ORDERED.

A handwritten signature in blue ink, appearing to read "RA".

Hon. Ronnie Abrams  
01/13/2022

/s/ Neil Shevlin  
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